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Representing the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DANIEL NATHAN,

Defendants.

Case No. 2:19-mj-00368-VCF

**STIPULATION TO CONTINUE
PRELIMINARY EXAMINATION
(Second Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between, the United States of America, through the undersigned, together with Michael Miceli, Esq., counsel for defendant DANIEL NATHAN, that the preliminary examination hearing currently scheduled for July 8, 2019 at 4:00 p.m., be vacated and reset to a date and time convenient to the Court but no sooner than sixty (60) days.

This stipulation is entered into for the following reasons:

1. The parties need a continuance to review discovery and discuss possible defenses and otherwise prepare for the preliminary hearing.
2. The parties need additional time to discuss potential pre-indictment resolutions that may obviate the need to proceed with the preliminary hearing.

1 3. The defendant is not currently incarcerated and does not object to the continuance.

2 4. Additionally, denial of this request for continuance could result in a
3 miscarriage of justice.

4 5. The additional time requested by this Stipulation is made in good faith and not
5 for purposes of delay.

6 6. This is the second request for a continuance of the preliminary hearing.

7 DATED this 1st day of July, 2019.

8
9 NICHOLAS A. TRUTANICH
UNITED STATES ATTORNEY

10 */s/ Alexandra Michael*

11 _____
ALEXANDRA MICHAEL
Assistant United States Attorney

/s/ Michael Miceli

MICHAEL MICELI, Esq.
Counsel for Defendant DANIEL NATHAN

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 vs.

6 DANIEL NATHAN,

7 Defendant.
8

Case No. 2:19-mj-00368-VCF

ORDER

9 The ends of justice served by granting said continuance outweigh the best interest of the
10 public and the defendant in a speedy preliminary hearing, since the failure to grant said
11 continuance would be likely to result in a miscarriage of justice, would deny the parties herein
12 sufficient time and the opportunity within which to be able to effectively and thoroughly prepare
13 for a preliminary hearing, taking into account the exercise of due diligence.

14 IT IS THEREFORE ORDERED that the preliminary examination in the above-
15 captioned matter currently scheduled for July 8, 2019 at 4:00 p.m., be vacated and continued to
16 September 6, 2019, at 4:00 ~~a.m.~~/p.m.

17 IT IS SO ORDERED.

18 July 1, 2019

19 Entered: _____



20 THE HONORABLE CAM FERENBACH
21 United States Magistrate Judge
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